

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

Joshua Wright ,	:	
Plaintiff,	:	
v.	:	Case No.
The Rector and Visitors of George Mason University <i>et al.</i> ,	:	
Defendants.	:	

**NOTICE OF REMOVAL**

To the Honorable Judges of the Eastern District of Virginia:

Defendants The Rector and Visitors of George Mason University (“Mason”) and Thomas Bluestein submit this Notice of Removal pursuant to 28 U.S.C. § 1441, *et seq.*, requesting that this Honorable Court assume jurisdiction over this action, and set forth the following reasons:

1. The above-captioned matter was commenced by the filing of a Complaint in the Circuit Court of Fairfax County. The action is currently pending in state court.
2. On December 5, 2023, Counsel for Defendants agreed to waive formal service of the Summons and Complaint and accept service by email. That day, Counsel for Plaintiff sent Defendants a copy of the Complaint, which is attached. On December 11, 2023, Counsel for Plaintiff sent Defendants the Summons and Fairfax County Circuit Court waiver of service forms. Defendants subsequently signed and returned the waiver of service forms on December 19, 2023, and Plaintiff filed them with the Fairfax Circuit Court on December 20, 2023.
3. Plaintiff’s Complaint asserts violations of federal law including Title IX and

claims pursuant to 42 U.S.C. § 1983 alleging violations of Plaintiff's Constitutional rights.

4. Pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1443, this case meets the requirements of removal to federal court as it asserts claims arising out of the United States Constitution, and laws of the United States, and maintains a "civil rights" action.

5. This Notice of Removal is being filed with the Court within thirty (30) days after service of the Summons and Complaint on Defendants. As such, removal is proper pursuant to 28 U.S.C. § 1446(b).

6. The filing of this Notice of Removal is being served on counsel for Plaintiff, and will be filed with the Clerk of Fairfax County Circuit Court pursuant to 28 U.S.C. § 1446(d).

7. Based on the foregoing, this action must be removed to United States District for the Eastern District of Virginia, Alexandria Division, pursuant to 28 U.S.C. § 1441, *et seq.*

WHEREFORE, the Defendants, respectfully request that this action be removed from Fairfax County Circuit Court to the United States District Court for the Eastern District of Virginia (Alexandria Division), and that this Honorable Court assume jurisdiction thereof.

Dated: January 2, 2024

RESPECTFULLY SUBMITTED

/s/

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*Attorney for the Rector and Visitors of George  
Mason University and Thomas Bluestein*

**CERTIFICATE OF SERVICE**

I certify that on January 2, 2024, a true and correct copy of the foregoing was served by email on:

Lindsay R. McKasson, Esq.  
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*Counsel for Joshua Wright*

I certify that a true and correct copy of the foregoing will be filed with the Clerk of the Fairfax Circuit Court.

/s/  
Eli S. Schlam